BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. E-2, SUB 931

)	
In the Matter of:)	
)	MOTION FOR SUBSTITUTION OF
Application for Approval of Demand-)	COUNSEL FOR NATURAL
Side Management and Energy)	RESOURCES DEFENSE COUNCIL
Efficiency Cost Recovery Rider)	AND SOUTHERN ALLIANCE FOR
)	CLEAN ENERGY
)	
	(

Pursuant to R1-7, R1-22, and R1-23 of the Rules of the North Carolina Utilities Commission ("Commission") and Rule 1.16 of the North Carolina State Bar Rules of Professional Conduct, the Natural Resources Defense Council ("NRDC") and the Southern Alliance for Clean Energy ("SACE"), by and through their undersigned counsel, moves to substitute counsel of record in the above-captioned docket.

NRDC and SACE wish to substitute David L. Neal and Munashe Magarira, both of the Southern Environmental Law Center ("SELC"), for Gudrun Thompson of SELC as counsel of record in this proceeding.

Mr. Neal is an attorney licensed in North Carolina and is a member in good standing of the North Carolina State Bar (No. 27992). Mr. Magarira, likewise, is an attorney licensed in North Carolina and a member in good standing of the North Carolina State Bar (No. 47904).

NRDC and SACE request that Ms. Thompson be permitted to withdraw as their counsel of record, that she be removed from the service list, and that all future filings, orders and correspondence in this docket be served on Mr. Neal and Mr. Magarira:

David L. Neal Munashe Magarira Southern Environmental Law Center 601 West Rosemary Street, Suite 220 Chapel Hill, NC 27516

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WHEREFORE, NRDC and SACE respectfully move the Commission for leave to substitute counsel by replacing Gudrun Thompson with David L. Neal and Munashe Magarira as counsel of record for NRDC and SACE, in this proceeding.

Respectfully submitted this 26th day of September, 2023.

/s/ Gudrun Thompson N.C. Bar No. 28829 SOUTHERN ENVIRONMENTAL LAW CENTER 601 W. Rosemary Street, Suite 220 Chapel Hill, NC 27516 Telephone: (919) 967-1450

Fax: (919) 929-9421 gthompson@selcnc.org

Attorney for Natural Resources Defense Council and Southern Alliance for Clean Energy

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion for Withdrawal and Substitution of Counsel for the Environmental Defense Fund, Natural Resources Defense Council, and Southern Alliance for Clean Energy, as filed today in Docket No. E-2, Sub 931 has been served on all parties of record by electronic mail or by deposit in the U.S. Mail, first-class, postage prepaid.

This 26th day of September, 2023.

s/ Gudrun Thompson